

Akin Gump

STRAUSS HAUER & FELD LLP

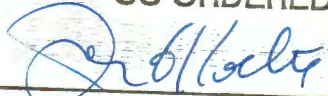
JAMES JOSEPH BENJAMIN, JR.
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December 13, 2021

The Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10001

APPLICATION GRANTED
SO ORDERED

12/13/21



John G. Koeltl, U.S.D.J.

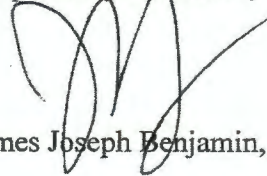
Re: *United States v. Hayes, et al.*, 20 Cr. 500 (JGK)

Dear Judge Koeltl:

Pursuant to the Court's order of May 11, 2021, ECF No. 71, the government and the Defendants will submit oppositions to motions *in limine* to the Court today. The same motion papers will be delivered to Chambers in both hard copy and electronic form.

Having conferred with the government pursuant to this Court's Individual Practices Rule VI.A.2, the parties respectfully seek leave from the Court to file these motion papers under seal at the present time because their supporting memoranda of law, declarations, and exhibits include materials that the government has designated "Confidential" or "Sensitive" pursuant to the protective orders that have been entered in this case, ECF Nos. 23, 41, 55, and that the moving parties contend are irrelevant, prejudicial, or otherwise inadmissible. The parties will confer on proposed redactions.

Respectfully submitted,



James Joseph Benjamin, Jr.

cc: Douglas K. Yatter (counsel to Samuel Reed)
Benjamin Naftalis (counsel to Samuel Reed)
Patrick J. Smith (counsel to Benjamin Delo)
Harlan A. Levy (counsel to Benjamin Delo)

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AUSA Samuel Raymond
AUSA Jessica Greenwood
AUSA Nathan Rehn
All Counsel of Record (via ECF)